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11 *Counsel for Defendants*

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 NJK

15 LING CAI et al.;

16 Plaintiffs,

17 v.

18 ENTERPRISE RENT-A-CAR OF SAN  
19 FRANCISCO, LLC d/b/a “ALAMO,” et al.,

20 Defendants.

21 Case No. 2:23-cv-00050-~~ART~~ NJK

22 **STIPULATION AND ~~PROPOSED~~  
23 ORDER TO EXTEND TIME TO  
24 RESPOND TO THIRD AMENDED  
25 COMPLAINT**

26 [FIRST REQUEST]

27 Defendants Enterprise Rent-A-Car OF San Francisco, LLC d/b/a “Alamo,” Rental  
28 Insurance Services, Inc., ELCO Administrative Services Co. d/b/a “Rental Claims Services”  
and ACE American Insurance Company (collectively, the “Defendants”), by and through their  
undersigned counsel, and Plaintiffs Ling Cai, Jing Xu, Z.X. a minor by and through his Natural  
Parent Jing Xu, and Tammy Harless, as Special Administrator of the Estate of Zhongping Zhou  
(“Plaintiffs” and collectively with Defendant, the “Parties”), by and through their undersigned  
counsel, hereby stipulate to extend the deadline for Defendants to file their response to the Third  
Amended Complaint (“TAC”) by one (1) week, until May 10, 2024.

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1        This is the first request to extend the time to respond to the TAC, filed April 19, 2024,  
2 Doc. 61. The short extension is necessary to allow Defendants to ascertain certain facts  
3 necessary to provide accurate responses to the allegations set forth in the TAC.

4        This stipulation is made in good faith and not for purposes of delay.

5        **IT IS SO STIPULATED.**

6        DATED this 2<sup>nd</sup> day of May, 2024.

7        **THE 702 FIRM**

8        */s/Michael Kane*

9        Bradley J. Meyers, Esq.  
10      Nevada Bar No. 8857  
11      Michael C. Kane, Esq.  
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13      3753 Howard Hughes Parkway, Suite 200  
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15      *Counsel for Plaintiffs*

16        DATED this 2<sup>nd</sup> day of May, 2024.

17        **GREENBERG TRAURIG, LLP**

18        */s/Eric Swanis*

19        Eric W. Swanis, Esq.  
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25      *Counsel for Defendants*

26        **IT IS SO ORDERED.**

27          
28        **UNITED STATES MAGISTRATE JUDGE**

29        DATED: May 3, 2024